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8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

11 DANG QUANG NGUYEN, a married man,  
12  
13 Plaintiff,  
14  
15 v.

16 STATS CHIPPAC INC., a Delaware  
17 Corporation; STATS CHIPPAC, LTD., a  
18 Singaporean corporation,  
19  
20 Defendants.

21 STATS CHIPPAC, INC., a Delaware  
22 corporation,  
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24 Counter-Complainant,  
25  
26 v.  
27  
28 DANG QUANG NGUYEN, an individual; and  
DOES 1 through 25, inclusive,  
Counter-Defendants.

Case No. 5:09-cv-03728-JW

**STIPULATION AND [PROPOSED]  
ORDER RE DISMISSAL WITH  
PREJUDICE PURSUANT TO FRCP 41(A)**

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1           **IT IS HEREBY STIPULATED** by and between the Parties to this action through their  
2 designated counsel that the above-referenced action (*e.g.*, both the Complaint and Counter-  
3 Complaint) be and hereby are dismissed, with prejudice, pursuant to FRCP Section 41(a)(1). The  
4 Parties are to bear their own costs and attorney's fees.

5           **IT IS SO STIPULATED ON THE DATES INDICATED BELOW.**

6  
7 DATED: December 3, 2010

DANG QUANG NGUYEN

8  
9 By: /s/ Dang Q. Nguyen  
Dang Q. Nguyen

10  
11 DATED: December 3, 2010

THE STROJNIK LAW FIRM LLC

12  
13 By: /s/ Peter K. Strojnik  
Peter K. Strojnik  
Attorneys for Plaintiff<sup>1</sup>  
DANG QUANG NGUYEN

14  
15  
16  
17 DATED: December 3, 2010

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

18  
19 By: /s/ Gregory C. Cheng  
Gregory C. Cheng  
Attorneys for Defendants  
STATS CHIPPAC, INC. AND STATS  
CHIPPAC, LTD.

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27 <sup>1</sup> By Order of this Court on November 2, 2010, this Court granted Mr. Strojnik's motion for  
28 withdraw as counsel of record. However, the Court ordered that Mr. Strojnik remain as the  
conditional attorney of record for 30 days until Plaintiff files either a notice of self-representation  
or the substitution of another attorney. With Mr. Strojnik's facilitation, the parties have settled this  
action

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**ORDER**

**GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED** the above-referenced action (both the Complaint and Counter-Complaint) be and hereby are dismissed, with prejudice, pursuant to FRCP Section 41(a)(1). The Parties are to bear their own costs and attorney's fees.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_  
United States District Court Judge